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February 18, 2022

By Hand Delivery

Nico Ratkowski
Anu Jaswal
Contreras & Metelska, P.A.
200 University Avenue W., Suite 200
St. Paul, MN 55103

Re: *Ericka Khounedaleth v. City of Minneapolis, et al.*
Court File No. 20-CV-02325 (WMW/KMM)

Dear Counsel:

Enclosed and served upon you please find the Rule 68 Offer of Judgment from Defendants to Plaintiff Ericka Khounedaleth.

Sincerely,

/s Sharda Enslin

Sharda Enslin
Assistant City Attorney

Enc.

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Ericka Khounedaleth,

Case No. 20-cv-02325 (WMW/KMM)

Plaintiff,

v.

City of Minneapolis, a municipal entity;
Officer Doe #1, in their individual and
official capacity; Officer Doe #2, in their
individual and official capacity,

RULE 68 OFFER OF JUDGMENT

Defendants.

TO: Plaintiff and her attorneys, Nico Ratkowski, Contreras & Metelska 200 University Ave. W., Suite 200, St. Paul, Minnesota 55103

Pursuant to Rule 68 of the Federal Rules of Civil Procedure, Defendant City of Minneapolis hereby offers to allow Plaintiff Ericka Khounedaleth to take judgment against it on all claims made or which could have been made in Plaintiff's Complaint or Amended Complaint in the total amount of Seven Thousand Five Hundred Dollars (\$7,500.00) plus reasonable attorneys' fees and costs incurred by Plaintiff prior to the date of this offer; that is, with the costs then accrued. The attorneys' fees and costs will be in an amount to be set by the Court.

Acceptance of this offer of judgment against Defendant City of Minneapolis will be full satisfaction of all federal and state law claims or rights that Plaintiff may have to damages, or any other form of relief, and extinguish any claim or claims by Plaintiff against all named Defendants, as well as the unnamed Officer Doe #1 and Officer Doe #2

Defendants, and their agents and employees that were brought or could have been brought in Plaintiff's Complaint or Amended Complaint. By accepting this offer of judgment, Plaintiff agrees that the existing claims against the City of Minneapolis, Officer Doe #1, and Officer Doe #2 will be dismissed with prejudice.

This offer of judgment is not to be construed as an admission that the Defendant or its agents and employees are liable in this action or that Plaintiff has suffered any damages. Defendant expressly denies the validity of Plaintiff's claims and expressly denies any liability. This offer is contingent on acceptance by Plaintiff in accordance with Rule 68 of the Federal Rules of Civil Procedure.

Dated: February 18, 2022

JAMES R. ROWADER, JR.
City Attorney
By s/ Sharda Enslin
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